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25 February 2000

Mr. Vernon A. Williams, Secretary
 Surface Transportation Board
 Office of the Secretary
 Case Control Unit
 Attn: STB Ex Parte No. 582
 1925 K Street, N.W.
 Washington, D.C. 20423-0001

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 Public Record



Dear Sir:

Petrosul International is a significant user of rail services in Canada and the U.S. We currently ship in excess of 1,500 carloads into markets in Canada, United States and offshore. The purpose of this letter is to comment on the issues to be discussed on March 8th, 2000 in Ex Parte 582.

We encourage the Surface Transportation Board to focus on whether the proposed CN-BNSF combination is good for shippers, not on potential downstream effects. The CN-BNSF combination should be judged on its merits and if other carriers propose mergers, then these cases ought to be evaluated on their merits.

The timing of the proposed CN-BNSF combination is not the central issue for our company. Our concern is service. Recent mergers have failed on service, not because of timing. Accordingly, the Surface Transportation Board should focus on ensuring that CN-BNSF combination, and any other future mergers, will deliver service. CN's recent merger with the Illinois Central went very smoothly and today we continue to enjoy the high level of service we expect from CN.

The Surface Transportation Board has a comprehensive process to evaluate railroad transactions and protect the public interest. It should fairly evaluate the CN-BNSF combination according to that process. Do not let other railroads use the Surface Transportation Board process to protect themselves and not shippers.

I, William B. Turner, declare under penalty of perjury that the foregoing is true and correct. Further, I certify that I am qualified and authorized to file this verified statement. Executed on 25 February, 2000.

Yours truly,

PETROSUL INTERNATIONAL LTD.

W.B. Turner
 Vice President Supply